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The Lion Electric Company
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

The Lion Electric Company, a Canadian
corporation,
Plaintiff,

v.

Nikola Corporation, a Delaware
corporation,

Defendant.

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Case No. 2:23-cv-00372-PHX-DGC

[PROPOSED] RULE 502(d) ORDER

- 25 1. The production of privileged or work-product protected documents,
26 electronically stored information (“ESI”) or information, whether inadvertent or otherwise,
27 is not a waiver of the privilege or protection from discovery in this case or in any other
28

1 federal or state proceeding. This Order shall be interpreted to provide the maximum
2 protection allowed by Federal Rule of Evidence 502(d).

3 2. Nothing contained herein is intended to or shall serve to limit a party's right
4 to conduct a review of documents, ESI or information (including metadata) for relevance,
5 responsiveness, and/or segregation of privileged and/or protected information before
6 production.

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8 SO ORDERED

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10 Date: _____, 2023

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Hon. David G. Campbell
Senior United States District Judge

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